

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KING COUNTY, WASHINGTON, et al.,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

vs.

IKB DEUTSCHE INDUSTRIEBANK AG, et
al.,

Defendants.

x

: Master File No. 1:09-cv-08387-SAS
(Consolidated)

: CLASS ACTION

: DECLARATION OF DANIEL S.
DROSMAN IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT MORGAN
STANLEY'S MOTION TO DISMISS THE
FIRST AMENDED COMPLAINT

x

I, DANIEL S. DROSMAN, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the States of California and New York and before this Court. I am a member of the law firm of Robbins Geller Rudman & Dowd LLP, one of the counsel of record for plaintiffs in the above-entitled action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

Exhibit 1: Excerpts from May 18, 2010 Decision/Conference hearing transcript;

Exhibit 2: Excerpts from July 20, 2010 hearing transcript in *Abu Dhabi Commercial Bank v. Morgan Stanley & Co. Inc.*, No. 08-CV-7508-SAS (S.D.N.Y.); and

Exhibit 3: Excerpts from Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion for Relief from Order of Dismissal (Dkt. #117), filed on May 10, 2010, in *Abu Dhabi Commercial Bank v. Morgan Stanley & Co. Inc.*, No. 08-CV-7508-SAS (S.D.N.Y.).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 12, 2010, at New York, New York.

s/ DANIEL S. DROSMAN

DANIEL S. DROSMAN

CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2010, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 12, 2010.

s/ DANIEL S. DROSMAN
DANIEL S. DROSMAN

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